

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

EDGEWOOD HIGH SCHOOL
OF THE SACRED HEART, INC.,
Plaintiff,

v.

CITY OF MADISON, WISCONSIN;
CITY OF MADISON ZONING BOARD
OF APPEALS; CITY OF MADISON
PLAN COMMISSION; and CITY OF
MADISON COMMON COUNCIL;
Defendants.

Case No. 3:21-CV-118

DECLARATION OF SHAWN SCHEY

I, Shawn Schey, under penalty of perjury, declare as follows:

1. I am an adult resident of Madison, Wisconsin. I reside at 878 Woodrow St, Madison WI 53711. I have lived on Woodrow Street next to the Edgewood Campus since 1985 and for almost 37 years. I make this declaration of my own personal knowledge.
2. I am the current Vice President and a member of the Dudgeon Monroe Neighborhood Association and have been a member since approximately 1985. I am also a member of the Zoning Committee of the Association. The Edgewood Neighborhood Liaison Committee is a committee comprised of representatives from each of the Edgewood schools (elementary, high school, and college) and both the Vilas and Dudgeon Monroe Neighborhoods. The Committee was created in approximately 1996-1997 and has met regularly and was involved in the approval of

Edgewood Campus' 1997 Master Plan and many other subsequent improvements that Edgewood has sought, including Edgewood's 2014 Master Plan. I was a member of the Edgewood Neighborhood Liaison Committee for 17 years from roughly 2001 to 2018.

3. As a member of both the Dudgeon Monroe Neighborhood Association and the Edgewood Neighborhood Liaison Committee, I regularly attended meetings of those organizations. Those organizations also had minutes of their meetings recorded, circulated and approved. They prepared minutes in their regular course of business.

4. Attached to this Declaration as Exhibit A is a true and correct copy of the minutes from the April 14, 2015 Edgewood Neighborhood Liaison Committee meeting that I attended. At this meeting, Maggie Balistreri-Clarke attended as the representative of Edgewood. She provided an update as to Edgewood High School Construction, which is shown as #5 in the minutes. She indicated that as to the Edgewood High School Football Field, no additional lighting or seating would be installed. She also confirmed that the football field would be a practice facility. This is memorialized in the last two bullets under the High School Football Field heading.

5. Attached to this Declaration as Exhibit B is a true and correct copy of my written testimony that I provided to the City's Zoning Board of Appeals at its July 11, 2019 meeting. I provided similar testimony to the City's Plan Commission


and the City's Common Council in connection with Edgewood's requests to play games, repeal its master plan and to receive lights for its athletic field.

6. The statements in my written testimony attached as Exhibit B are true and correct to the best of my ability. In 1996, Edgewood proposed to the neighborhood association a conditional use plan whereby Edgewood wanted to add lights, a sound system and a grandstand to its athletic field. It also proposed a permanent structure for its athletic complex. The Dudgeon Monroe Neighborhood Association Council adopted a resolution endorsing the majority vote of the neighbors taken at a meeting on July 18, 1996. Attached as Exhibit C are the recorded meeting minutes of the Dudgeon Monroe Neighborhood Association from August 14, 1996. While I was not in attendance at this meeting, I was a member of the association at the time and regularly received copies of the minutes. The association indicated to Edgewood that it would not support adding lights or a new sound system to its athletic field. It also indicated that it would not support a larger grandstand but would support 300 bleacher seats.

7. Following the August 14, 1996 meeting, Edgewood revised its conditional use application with the City and removed all lights, the sound system and the larger grandstand.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this 18th day of May, 2022.


Shawn Schey

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